IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re application of	Docket No: Q65358
Satoshi HOSHINO	
Appln. No.: 09/899,075	Group Art Unit: 3693
Confirmation No.: 3548	Examiner: Jason M. Borlinghaus
Filed: July 6, 2001	

For: AUTHENTICITY CHECKER FOR DRIVER'S LICENSE, AUTOMATED-TELLER MACHINE PROVIDED WITH THE CHECKER AND PROGRAM RECORDING MEDIUM

SUBMISSION OF APPEAL BRIEF

MAIL STOP APPEAL BRIEF - PATENTS
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

Submitted herewith please find an Appeal Brief. The statutory fee of $510.00 is being paid via EFS filing screen. The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

Ebenesar Thomas

Ebenesar D. Thomas
Registration No. 62,499

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: July 22, 2008

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re application of   Docket No: Q65358

Satoshi HOSHINO

Appln. No.: 09/899,075   Group Art Unit: 3693

Confirmation No.: 3548   Examiner: Jason M. Borlinghaus

Filed: July 6, 2001

For: AUTHENTICITY CHECKER FOR DRIVER'S LICENSE, AUTOMATED-TELLER
       MACHINE PROVIDED WITH THE CHECKER AND PROGRAM RECORDING
       MEDIUM

APPEAL BRIEF UNDER 37 C.F.R. § 41.37

MAIL STOP APPEAL BRIEF - PATENTS
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

        In accordance with the provisions of 37 C.F.R. § 41.37, Appellant submits the following:

Table of Contents

I.   REAL PARTY IN INTEREST

The real party in interest is NEC Corporation, the assignee of the present application, by

virtue of an assignment executed by Satoshi Hoshino on July 2, 2001. The assignment was

recorded on July 6, 2001, at Reel 011973, Frame 0520.

II.   RELATED APPEALS AND INTERFERENCES

Upon information and belief, there are no other prior pending appeals, interferences or

judicial proceedings known to Appellants' Representative or the Assignee that may be related to,

be directly affected by, or have bearing on the Board's decision in the Appeal.

III.   STATUS OF CLAIMS

Claims 1-15 are all the claims pending in the application. Claims 1-8 and 14-15 have

been rejected, and are the subject of this appeal. Claims 9-13 are withdrawn from consideration.

IV.   STATUS OF AMENDMENTS

There was no Amendment filed subsequent to the Final Office Action that was issued on

August 15, 2007. Accordingly, there are no outstanding, non-entered amendments of the claims.

V.   SUMMARY OF THE CLAIMED SUBJECT MATTER

The claimed invention relates to an authenticity checker for a driver's license, which automatically judges the authenticity of driver's license. Specification, page 1, lines 2-4.

There are two kinds of driver's licenses. One is a "face-watermarked type driver's license" whose image data obtained by capturing its obverse side shows a clear watermark, while the image data of its reverse side does not. The other kind is a "back-watermarked type driver's license", whose image data obtained by capturing its backside shows a clear watermark, while the image data of its obverse side does not. Consequently, a related art device that judges the authenticity of a driver's' license only by the image data of its obverse side may judge an authentic back-watermarked type driver's license to be false by mistake. Specification, page 1, line 20-page 2, line 8.

In view of the foregoing, an objective of the claimed invention is to judge the authenticity of the face-watermarked type driver's license and the back-watermark type driver's license automatically. Specification, page 2, line 11-13.

A summary of the claimed subject matter, by independent claims and dependent claims separately argued, with reference to the specification, is identified below.

Independent claim 1

In accordance with an exemplary, non-limiting embodiment of the claimed invention, there is provided an authenticity checker of driver's license, for example, such as that shown in FIG. 3, for judging the authenticity of the driver's license.

The authenticity checker comprises a driver's license image capturing module (first camera 203, second camera 204; FIG. 3) for image capturing a watermark of a driver's license

(201; FIG. 3) from both obverse and reverse side (described generally in page 7, lines 21-28);

and

an authenticity judging module (authenticity judging section 103; FIG. 2) which judges the driver's license is a forgery if neither of the watermarks image captured from the obverse nor reverse side by the driver's license image capturing module is recognized as a regular watermark, and judges the driver's license is authentic if at least one of watermarks is recognized as a regular watermark (generally described in page 6, line 19-21; page 8, line 26-page 9, line 3; and page 9. lines 15-20).

Independent claim 2

In accordance with an exemplary, non-limiting embodiment of the claimed invention, there is provided an authenticity checker of driver's license, for example, such as that shown in FIG. 3, for judging the authenticity of the driver's license.

The authenticity checker of driver's license comprises a driver's license image capturing means (first camera 203, second camera 204; FIG. 3) which image captures a watermark of a driver's license (201; FIG. 3) from either obverse or reverse side according to a image capturing instruction, and image captures the watermark from the other side according to a re-image capturing instruction (described generally in page 7, lines 21-28);

an authenticity judging means (authenticity judging section 103; FIG. 2) which judges the driver's license is authentic if the watermark image captured by the driver's license image capturing means is recognized as a regular watermark, and judges the driver's license is a forgery if neither of the watermarks image captured from the obverse nor reverse side is recognized as a

regular watermark (generally described in page 6, line 19-21; page 8, line 26-page 9, line 3; and

page 9, lines 15-20); and

a driver's license image capturing controller (controller 101; FIG. 2) which outputs the

image capturing instruction to the driver's license image capturing at the beginning of the

authenticity judging operation (generally described in page 8, lines 16-20), and outputs the re-

image capturing instruction to the driver's license image capturing means if the watermark image

captured from one side is not recognized as a regular watermark (generally described in page 9,

lines 4-14).

Independent claim 14

In accordance with an exemplary, non-limiting embodiment of the claimed invention,

there is provided a method of authenticating a driver's license, for example, such as that shown

in FIG. 3.

The method of authenticating a driver's license comprises gathering first driver's license

imaging data based on a watermark on the obverse side of a driver's license (first camera 203,

second camera 204; FIG. 3), wherein the gathering of first driver's license imaging data further

comprises irradiating the driver's license (first light 205 and second light 206, FIG. 3) (generally

described in page 7, line 19-page 8, line 25);

determining (authenticity judging section 103; FIG. 2) if the watermark on the obverse

side is regular based on the first driver's license imaging data (generally described in page 6, line

19-21; page 8, line 26-page 9, line 3);

if the watermark on the obverse is determined not regular, gathering second driver's

license imaging data based on a watermark on the reverse side of the driver's license (generally

described in page 9, lines 4-14), and determining if the watermark on the reverse side is regular

based on the second driver's license imaging data, and wherein the gathering of first driver's

license imaging data further comprises irradiating the driver's license (generally described in

page 9, lines 15-20);

wherein, the driver's license is a forgery if the watermarks on the obverse and reverse

sides are both deemed not regular, and the driver's license is authentic if either watermark on the

obverse and reverse side is deemed regular (generally described in page 8, line 26-page 9, line 3

and page 9, lines 15-20).

Independent claim 15

In accordance with an exemplary, non-limiting embodiment of the claimed invention,

there is provided a computer program product for enabling a computer to control the

authentication of a driver's license, for example, such as that shown in FIG. 3.

The computer program comprises a computer readable medium (recording medium K);

and software instructions on the computer readable medium (generally described in page 7, lines

10-15) adapted to enable the computer to perform operations of:

gathering first driver's license imaging data based on a watermark on the obverse side of

a driver's license(first camera 203, second camera 204; FIG. 3), wherein the gathering of first

driver's license imaging data further comprises irradiating the driver's license (first light 205 and

second light 206, FIG. 3) (generally described in page 7, line 19-page 8, line 25);

determining (authenticity judging section 103; FIG. 2) if the watermark on the obverse

side is regular based on the first driver's license imaging data (generally described in page 6, line

19-21; page 8, line 26-page 9, line 3);

if the watermark on the obverse is determined not regular, gathering second driver's

license imaging data based on a watermark on the reverse side of the driver's license (generally

described in page 9, lines 4-14), and determining if the watermark on the reverse side is regular

based on the second driver's license imaging data, and wherein the gathering of first driver's

license imaging data further comprises irradiating the driver's license (generally described in

page 9, lines 15-20);

wherein, the driver's license is displayed as a forgery if the watermarks on the obverse

and reverse sides are both deemed not regular, and the driver's license is displayed as authentic if

either watermark on the obverse and reverse side is deemed regular (generally described in page

8, line 26-page 9, line 3 and page 9, lines 15-20).

Means plus function elements in dependent claims

Dependent claim 5

A revolving means (element 213; FIG. 6) for revolving the driver's license between the

lens and the light so that the obverse or the backside of the driver's license is placed opposite to

the lens (described in page 10, lines 2-3).

Dependent claim 7

A conveyor means for carrying a driver's license (element 222; FIG. 7) (described in

page 11, lines 7-10).

VI.   GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

The issues on appeal are summarized as follows:

1. Whether claims 1-8 and 14-15 are properly rejected under 35 U.S.C. § 103(a) as being

unpatentable over Kofune et al. (U.S. Patent 5,483,069; hereinafter "Kofune") in view of the

Allegedly Admitted Prior Art (AAPA).

VII.   ARGUMENT

At least for the reasons discussed below, Appellant submits that the rejections of the claims on appeal are improper, and reversal of each ground of rejection is request. Appellant turns now to the rejection at issue.

Claims rejection under 35 U.S.C. § 103

<u>Claims 1-8, 14 and 15</u>

Claims 1-8 are 14-15 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Kofune et al. (US Patent 5, 483, 069; hereinafter "Kofune") in view of the Allegedly Admitted Prior Art (AAPA).

Appellant submits that Kofune, alone or in combination with the AAPA, does not disclose all the limitations as recited in claim 1. For instance, claim 1 recites, *inter alia*, "a driver's license image capturing module for image capturing a watermark of a driver's license from both obverse and reverse side and an authenticity judging module which judges the driver's license is a forgery if neither of the watermarks image captured from the obverse nor reverse side by the driver's license image capturing module is recognized as a regular watermark, and judges the driver's license is authentic if at least one of watermarks is recognized as a regular watermark."

Kofune is directed to an apparatus for validating bank bills by comparing patterns read on each bills with a pattern data of true bills stored in a memory (Abstract). Kofune discloses a reflection light sensor 3 and a transmission light sensor 8 (FIG. 6). The reflection light sensor 3 includes a reflection light emitter 4 and reflection light detector 5 (FIG. 7). The transmission

light sensor 8 includes a transmitted light emitter 7 and transmitted light detector 6 (FIG. 7)[1].

The sensors 3 and 8 are arranged in a row and parallel with the conveying direction of the bank

bill 1 to read its print patterns of the same position. The reflection light sensor 3 detects only the

print patterns on the surface and the transmission light sensor detects a signal including the

pattern of the watermark D with the print patterns (column 5, lines 60-64).

It is Appellant's position that Kofune and AAPA, alone or in combination, fails to

disclose image capturing module and authenticity judging module as recited in claim 1.

Image capturing module

In the Final Office Action dated August 15, 2007, the Examiner asserts that FIGS. 6-7

and column 5, line 35-column 6, line 21 of Kofune disclose an image capturing module allegedly

including all the limitations of the image capturing module as defined by claim 1. However, that

portion merely discloses print patterns on the surface (column 5, line 60) and watermark pattern

D; it does not disclose a watermark on the obverse side and a watermark on the reverse side.

Moreover, since Kofune discloses that both the detectors 5 and 6 of sensors 3 and 8 are

arranged in arrow and parallel with the conveying direction of the bank bill 1, both the detectors

captures the image on the same surface (i.e. same side). Accordingly, Kofune does not disclose a

capturing a watermark of a driver's license from both obverse and reverse side.

Furthermore, Kofune discloses the reflection light sensor 3 detects <u>only the print patterns</u>

on the surface (column 5, line 60) and does not disclose detecting the watermark pattern D.

---

[1] It is clear from the illustration of FIG. 6 that element 7 emits the light and element 6 detects the light. However, the transmitted light emitter and transmitted light detector appear incorrectly labeled in FIG. 7.

Accordingly, Kofune discloses only one sensor (the light transmission light sensor 8) to detect

watermark pattern D from the top side of the bill 1; it does not disclose a sensor for capturing a

watermark image from both the obverse and reverse side of the driver's license. That is, Kofune

disclose one detector for print pattern data on the surface and another detector for watermarks D,

but does not disclose capturing watermarks from both the obverse and reverse sides.

Authenticity judging module

The Examiner contends that column 1, lines 16-22 and column 5, line 35-column 6, line

21 disclose an authenticity judging module with all the features as defined in claim 1. Appellant

respectfully submits that in the portion of the reference relied on by the Examiner, Kofune

discloses that data on print patterns of the bill are detected and compared with print pattern data

of the corresponding true bills sorted in a memory (column 1, lines 16-22).

Moreover, Kofune disclose that the bill is validated as a true one if the output data on the

portion corresponding to the watermark D from both sensors 3 and 8 do not coincide with each

other (FIG. 6-8; and column 5, lines 65-67). However, this does not disclose an authenticity

judging module which judges the driver's license is a forgery **if neither of the watermarks**

image captured from the obverse nor reverse side by the driver's license image capturing

module is recognized as a regular watermark, and judges the driver's license is authentic if at

least one of watermarks is recognized as a regular watermark. The Examiner fails to give weight

to this feature recited in claim 1.

In particular, Kofune discloses checking to see if the output data on the portion

corresponding to watermark D (center portion on bill 1) from the reflective light sensor 3 and the

transmission light sensor 8 coincide. As noted above, the reflective light sensor 3 does not detect

the pattern of the watermark D. Consequently, Kofune would not be understood to disclose that

a bill is a forgery if neither of the watermark image captured from the obverse nor reverse side is

recognized as a regular watermark. In fact, Kofune merely discloses that the bill 1 is validated

by comparing the data detected by the sensors 3 and 8 with each other to see if they coincide. If

the data detected by the two sensors coincide the bill is disclosed to be forged (column 6, lines 1-

12). However, this does not disclose judging that the bill is a forgery **if both the watermarks**

(only one watermark and one sensor detecting the watermark is disclosed in Kofune) **captured**

from the obverse side and the reverse side (only one side is disclosed in Kofune) **is not**

recognized as a regular watermark.

The AAPA conventional system disclosed in the specification discloses that watermark is

obtained by the capturing the data only from the obverse side of the driver's license. Since both

Kofune and the conventional system disclosed in the specification, alone or combined, do not

disclose all the limitations of claim 1 as recited in the claim, claim 1 is allowable over the cited

references.

Appellant respectfully submits that claims 2, 14 and 15 recite subject matter analogous to

claim 1, and therefore are allowable at least for the similar reasons claim 1 is shown to be

allowable.

Appellant respectfully submit that claims that depend from claims 1 or 2 are allowable at

least by virtue of their dependency.

Claims 14

Furthermore, claim 14 recites, *inter alia*, that "**if the watermark on the obverse is**

determined not regular, gathering second driver's license imaging data based on a

watermark on the reverse side of the driver's license, and determining if the watermark on the

reverse side is regular based on the second driver's license imaging data, and wherein the

gathering of first driver's license imaging data further comprises irradiating the driver's license;

wherein, the driver's license is a forgery if the watermarks on the obverse and reverse sides are

both deemed not regular, and the driver's license is authentic if either watermark on the obverse

and reverse side is deemed regular."

Appellant respectfully submits that the Examiner does not give any weight the portion of

the claim that recites **if the watermark on the obverse is determined not regular, gathering**

second driver's license imaging data based on a watermark on the reverse side of the

driver's license. This feature of claim 14 is not disclosed in Kofune nor the conventional

system disclosed in the specification. Specifically, Kofune discloses that the sensors 3 and 8 are

arranged in row and are in parallel. Both the sensors 3 and 8 detects data and compare to see if

the detected data coincide. However, Kofune does not disclose **gathering** a second imaging

data based on **a watermark on the reverse side** of the driver's license, **if the watermark on the**

obverse side is determined not to be regular. That is, Kofune and AAPA, alone or in

combination, do not disclose that **if** the watermark of one (obverse) side is determined to be

irregular, then gathering watermark image data from the other (reverse) side.

Claims 3 and 4

Applicant submits that claims 3-8 depend from claim 1, and therefore are allowable at

least by virtue of their dependency.

With further regard to claims 3 and 4, Appellant respectfully submits that Kofune and

AAPA, alone or in combination, do not disclose first and second cameras to shoot the driver's

license from the obverse and reverse side and first and second lights to irradiate the driver's

license from the reverse and obverse side. The Examiner contends that FIG. 6-7 and column 5,

line 35-column 6, line 21 disclose these elements of claim 3. However, the Examiner admits that

Kofune does not disclose this element on page 4 of the August 15th Final Office Action, but

asserts that Kofune does disclose first and second camera to shoot watermarks contained on the

obverse and reverse sides.

As discussed above, with respect to claim 1, that portion of Kofune merely discloses that

both the detectors 5 and 6 of sensors 3 and 8 are arranged in arrow and parallel with the

conveying direction of the bank bill 1. Therefore, Kofune discloses that both the detectors

captures the image on the same surface (i.e. same side) and does not disclose a first and second

camera to shoot the driver's license from the obverse and reverse side.

Moreover, as discussed above, Kofune discloses the reflection light sensor 3 detects only

the print patterns on the surface (column 5, line 60) and does not disclose detecting the

watermark pattern D. Accordingly, Kofune discloses only one sensor (the light transmission

light sensor 8) to detect watermark pattern D from the top side of the bill 1. Therefore, Kofune

does not disclose first and second cameras to shoot watermarks contained on the obverse and

reverse sides as alleged by the Examiner.

Claims 5 and 6

With further regards to claims 5 and 6, Appellant submits that Kofune and AAPA, alone

or in combination, do not disclose a revolving means for revolving the driver's license between

the lens (of the camera) and the light so that the obverse or the backside of the driver's license is

placed opposite to the lens. The Examiner alleges that the conveying means corresponds to the claimed revolving means.

Appellant respectfully submits that a conveying means 2 such as a belt or the like used to convey the bill 1 does not disclose a revolving means that revolves the driver's license.

With regard to the terms "revolving means" and "revolve", one skilled in the art would have no difficulty understanding the meaning of these terms as recited in the claims. For example, Merriam Webster's online dictionary, defines "revolve" as to turn or roll round on an axis. This definition is consistent with the use of the term in the specification. See, for example, page 9, line 28-page 11, line 5 of the specification and the FIG. 6.

Furthermore, MPEP section 2111.01 states that:

> Although claims of issued patents are interpreted in light of the specification, prosecution history, prior art and other claims, this is not the mode of claim interpretation to be applied during examination. During examination, the claims must be interpreted as broadly as their terms reasonably allow. In re American Academy of Science Tech Center, 367 F.3d 1359, 1369, 70 USPQ2d 1827, 1834 (Fed. Cir. 2004) (The USPTO uses a different standard for construing claims than that used by district courts; during examination the USPTO must give claims their broadest reasonable interpretation in light of the specification.). This means that **the words of the claim must be given their plain meaning unless the plain meaning is inconsistent with the specification.** In re Zletz, 893 F.2d 319, 321, 13 USPQ2d 1320, 1322 (Fed. Cir. 1989).

Appellant respectfully submits that since the literal, plain and ordinary meaning of the term "revolve" defined above is in fact consistent with the definition and description provided in

the specification and since the "conveying means that conveys the bill is inconsistent with the literal, plain and ordinary meaning of the term "revolve", Kofune does not disclose the revolving means recited in claims 5 and 6.

Claims 7 and 8

With regard to claims 7 and 8, Appellant submits that Kofune does not disclose first and second optical systems for propagating light, which has been outputted from the first or second light and transmitted through the driver's license, to the camera. The Examiner does not indicate where Kofune and/or AAPA discloses these features of claims 7 and 8.

In addition, Appellant submits that the Examiner' assertion that certain features of the claimed invention are obvious because the represent mere "duplication" (second camera and additional light in claims 3-8) is also improper. On page 8, of the August 15th Final Office Action, the Examiner contends that "in the instant application, multiple cameras and multiple light sources are being utilized while the prior art reference disclose a sing camera and a single light source being utilized. The result of multiple cameras and multiple light sources provides the expected result of capturing images from multiple cameras light by multiple light sources from multiple angles."

Appellant respectfully submit that since the object of the claimed invention is to overcome a deficiency of a conventional device that judges the authenticity of a driver's license only by the image data of the obverse side and since the claimed invention provides judging the authenticity of the driver's license automatically using image data of the obverse and the reverse side, the claimed invention provides a result that is new and addresses a problem that was not at all considered by the conventional devices.

Conclusion

　　For the reasons discussed above, Appellants respectfully request the Board to reverse the

final rejection of the pending claims 1-8 and 14-15.

　　The statutory fee of $510.00 is being paid via EFS filing screen. Also, the USPTO is

directed and authorized to charge all required fees, except for the Issue Fee and the Publication

Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit

Account.

　　　　　　　　　　　　　　　　　　　Respectfully submitted,

SUGHRUE MION, PLLC　　　　　　　　　Ebenesar D. Thomas
Telephone: (202) 293-7060　　　　　　　　Registration No. 62,499
Facsimile: (202) 293-7860

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: July 22, 2008

20

CLAIMS APPENDIX

CLAIMS <u>1-8 and 14-15</u> ON APPEAL:

1. An authenticity checker of driver's license comprising:

a driver's license image capturing module for image capturing a watermark of a driver's license from both obverse and reverse side; and

an authenticity judging module which judges the driver's license is a forgery if neither of the watermarks image captured from the obverse nor reverse side by the driver's license image capturing module is recognized as a regular watermark, and judges the driver's license is authentic if at least one of watermarks is recognized as a regular watermark.

2. An authenticity checker of driver's license comprising:

a driver's license image capturing means which image captures a watermark of a driver's license from either obverse or reverse side according to a image capturing instruction, and image captures the watermark from the other side according to a re-image capturing instruction;

an authenticity judging means which judges the driver's license is authentic if the watermark image captured by the driver's license image capturing means is recognized as a regular watermark, and judges the driver's license is a forgery if neither of the watermarks image captured from the obverse nor reverse side is recognized as a regular watermark; and

a driver's license image capturing controller which outputs the image capturing instruction to the driver's license image capturing at the beginning of the authenticity judging operation, and outputs the re-image capturing instruction to the driver's license image capturing means if the watermark image captured from one side is not recognized as a regular watermark.

3. The authenticity checker of driver's license as claimed in claim 1, the driver's license image capturing module comprising:

first and second cameras to shoot the driver's license from the obverse and reverse side; and

first and second lights to irradiate the driver's license from the reverse and obverse side.

4. (previously presented) The authenticity checker of driver's license as claimed in claim 2, the driver's license image capturing module comprising:

first and second cameras to image capture the driver's license from the obverse and reverse side; and

first and second lights to irradiate the driver's license from the reverse and obverse side.

5. The authenticity checker of driver's license as claimed in claim 1, the driver's license image capturing module comprising:

a camera for image capturing a driver's license;

a light which is placed opposite to a lens of the camera; and

a revolving means for revolving the driver's license between the lens and the light

so that the obverse or the backside of the driver's license is placed opposite to the lens.

6. The authenticity checker of driver's license as claimed in claim 2, the driver's license image capturing means comprising:

a camera for image capturing the driver's license;

a light which is placed opposite to a lens of the camera; and

a revolving means for revolving the driver's license between the lens and the light

so that the obverse or the backside of the driver's license is placed opposite to the lens.

7. The authenticity checker of driver's license as claimed in claim 1, the driver's license image capturing module comprising:

a camera;

a conveyor means for carrying a driver's license;

first and second lights for irradiating both sides of the driver's license which has been carried to a fixed place by the conveyor means; and

first and second optical systems for propagating light, which has been outputted from the first or second light and transmitted through the driver's license, to the camera.

8. The authenticity checker of driver's license as claimed in claim 2, the driver's license image capturing module comprising:

a camera;

a conveyor means for carrying a driver's license;

first and second lights for irradiating both sides of the driver's license which has been carried to a fixed place by the conveyor means; and

first and second optical systems for propagating light, which has been outputted from the first or second light and transmitted through the driver's license, to the camera.

14. A method of authenticating a driver's license, the method comprising:

gathering first driver's license imaging data based on a watermark on the obverse side of a driver's license, wherein the gathering of first driver's license imaging data further comprises irradiating the driver's license;

determining if the watermark on the obverse side is regular based on the first driver's license imaging data;

if the watermark on the obverse is determined not regular, gathering second driver's license imaging data based on a watermark on the reverse side of the driver's license, and determining if the watermark on the reverse side is regular based on the second driver's license imaging data, and wherein the gathering of first driver's license imaging data further comprises irradiating the driver's license;

wherein, the driver's license is a forgery if the watermarks on the obverse and reverse

sides are both deemed not regular, and the driver's license is authentic if either watermark on the

obverse and reverse side is deemed regular.

15. A computer program product for enabling a computer to control the authentication of

a driver's license, the computer program comprising:

a computer readable medium; and

software instructions on the computer readable medium adapted to enable the computer

to perform operations of:

gathering first driver's license imaging data based on a watermark on the

obverse side of a driver's license, wherein the gathering of first driver's license

imaging data further comprises irradiating the driver's license;

determining if the watermark on the obverse side is regular based on the

first driver's license imaging data;

if the watermark on the obverse is determined not regular, gathering

second driver's license imaging data based on a watermark on the reverse side of

the driver's license, and determining if the watermark on the reverse side is

regular based on the second driver's license imaging data, and wherein the

gathering of first driver's license imaging data further comprises irradiating the

driver's license;

wherein, the driver's license is displayed as a forgery if the watermarks on the obverse

and reverse sides are both deemed not regular, and the driver's license is displayed as authentic if

either watermark on the obverse and reverse side is deemed regular.

EVIDENCE APPENDIX

Appellants submit, pursuant to 37 C.F.R. § 41.37(c)(1)(ix), that no evidence submitted

pursuant to 37 C.F.R. §§ 1.130, 1.131, or 1.132 or any other evidence, other than the prior art

references of record, have been relied upon by Appellant in the appeal.

RELATED PROCEEDINGS APPENDIX

No proceedings have been identified above in Section II pursuant to 37 C.F.R. § 41.37(c)(1)(ii).